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10 Attorneys for Defendants
11 DEUTSCHE ASSET MANAGEMENT,
DEUTSCHE BANK AG, DEUTSCHE
12 INVESTMENT MANAGEMENT AMERICAS, INC.
SCUDDER DISTRIBUTORS, INC.
13

14 UNITED STATES DISTRICT COURT
15 FOR THE NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION
16

17 LAWRENCE ROMANECK,

Case No. C 05 02473 TEH

18 Plaintiff,

**STIPULATION AND ORDER TO
EXTEND DEADLINE TO FILE A
MOTION TO COMPEL FACT
DISCOVERY**

19 v.

20 DEUTSCHE ASSET MANAGEMENT, a
Delaware corporation, DEUTSCHE BANK
21 AG, a New York corporation, DEUTSCHE
INVESTMENT MANAGEMENT
22 AMERICAS, INC., a corporation, SCUDDER
DISTRIBUTORS, INC. a corporation,
23 INDIVIDUAL DOES I-XV and CORPORATE
DOES XVI – XXV, inclusive

24 Defendants.
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1-PA/3591391.1

Case No. C05-02473 TEH
STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE A MOTION TO COMPEL
FACT DISCOVERY

1 IT IS HEREBY STIPULATED between the parties, through their respective counsel of
2 record, and subject to the approval of this Court, that:

3 WHEREAS, the last day to file a motion to compel fact discovery is June 7, 2006; and

4 WHEREAS, the parties have worked in good faith to resolve a number of discovery
5 issues, but certain issues remain under discussion; and

6 GOOD CAUSE EXISTS to extend the deadline to file a Motion to Compel Fact
7 Discovery from June 7, 2006, so that the parties can attempt to resolve those issues and assess
8 settlement prospects, and because no other litigation deadlines will be prejudiced by a short
9 continuance;

10 THEREFORE, the parties stipulate that the last day to file a Motion to Compel Fact
11 Discovery should be extended to June 28, 2006.

12 Dated: June 6, 2006

MORGAN, LEWIS & BOCKIUS LLP

13 By _____
14 Brian L. Johnsrud
15 Attorneys for Defendants
16 Deutsche Asset Management, Deutsche Bank
17 AG, Deutsche Investment Management
Americas, Inc., and Scudder Distributors, Inc.

18 Dated: June 6, 2006

THE ARMSTRONG LAW FIRM

19 By _____
20 Kelly H. Armstrong
21 Attorney for Plaintiff
Lawrence Romanek

22 Dated: June 6, 2006

THE BRADY LAW GROUP

23 By _____
24 Steven J. Brady
25 Attorney for Plaintiff
Lawrence Romanek

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20 Kelly H. Armstrong
21 Attorney for Plaintiff
Lawrence Romanek

22 Dated: June 6, 2006

THE BRADY LAW GROUP

23 By _____
24 Steven J. Brady
25 Attorney for Plaintiff
Lawrence Romanek

ORDER

The Court, having considered the Stipulation of Plaintiff and Defendant, approves said Stipulation per the terms contained therein.

IT IS SO ORDERED.

Dated: 6/7/06

JUDGE OF THE UNITED STATES DISTRICT COURT